

T-Pro Copilot Compliance with NHS England AVT Requirements

Requirement	Compliant
DTAC, DSPT, Cyber Essentials Plus and CREST approved pen testing	✓
Data Protection Requirements	✓
Clinically Safe (DCB0129 compliant)	✓
End to end encryption and GDPR compliance	✓
No unsafe functionality	✓
NHS system integrations	✓
Responsible for translation accuracy	✓
Workflow integrations	✓
Economic justification	✓
Clinically Valid	✓

Executive Summary: This letter provides confirmation that T-Pro Copilot complies with NHS England's assurance requirements for Ambient Voice Technology (AVT) solutions, including those outlined in the Priority Notification dated 9th June 2025 from Dr Alec Price-Forbes, National Chief Clinical Information Officer.

Our solution has been designed and governed in line with national digital, clinical safety, and data protection standards. T-Pro Copilot is undergoing MHRA Class I medical device registration under the UK MDR 2002, and all core and enhanced NHS requirements for AVT solutions are met or exceeded.

Core Platform Assurance Requirements

NHS Requirement: *"Digital Technology Assessment Criteria (DTAC), Data Security and Protection Toolkit (DSPT), Cyber Essentials Plus, CREST-approved pen testing."* ✓

T-Pro Compliance:

T-Pro has prepared a complete Digital Technology Assessment Criteria (DTAC) evidence pack aligned to all five domains: clinical safety, data protection, security, interoperability, and usability. We are listed on the DSP Toolkit with a status of "Standards Exceeded." Cyber Essentials Plus certification is maintained and updated annually. A CREST-accredited penetration test is completed annually, covering Copilot's API endpoints and application infrastructure.

NHS Requirement: *"Data Protection Requirements as set by ICO – Local ICB / Trust governance approval including DPIA completion."* ✓

T-Pro Compliance:

Data Protection Impact Assessments have been completed for all clients. These documents are aligned with ICO principles and are completed collaboratively with local Trust or ICB governance teams. Data flows, retention, processor/sub-processor responsibilities, and security controls are fully detailed and regularly updated.

NHS Requirement: *"Clinical Safety Officer(s) named and accountable."*



T-Pro Compliance:

At T-Pro, clinical safety is an integral component of our governance and product lifecycle. Our Clinical Safety Officers hold current, accredited certification and participate in ongoing, structured training to ensure alignment with the latest clinical risk management standards.

We operate a rigorous and continuously maintained Clinical Safety Management System, including:

- Living Documentation — clinical safety cases and hazard logs are regularly reviewed and updated in line with product changes and field feedback.
- Proactive Incident Response — clearly defined escalation pathways and response protocols are tested and refined to ensure readiness and resilience.
- Embedded Standards Compliance — our clinical safety processes are fully aligned with, and in many cases exceed, NHS England's DCB requirements.

This commitment ensures that safety is not treated as a static obligation, but as an evolving, embedded practice that informs every aspect of our platform and operations.

NHS Requirement: *"End-to-end encryption and GDPR compliance."*



T-Pro Compliance:

All data in transit is secured using TLS 1.2+, and data at rest is encrypted using AES-256. Data minimisation, storage limitation, access control, and audit logging are enforced across the platform. Role-based access is managed in the frontend and backend with SSO and MFA optional.

NHS Requirement: *"No unsafe functionality e.g. prompt injection access."*



T-Pro Compliance:

T-Pro is architected with clinical-grade safety as a foundational principle, employing layered defences to neutralise prompt injection threats. Crucially, the platform does not offer any chat-based access or direct user input into the underlying AI models. All interactions are strictly governed by predefined, context-specific workflows that have undergone clinical validation. User inputs are subjected to rigidly enforced controls that sanitise and limit their scope, ensuring there is no mechanism for injecting freeform prompts or bypassing the system's built-in safety protocols

NHS Requirement: *"Appropriate NHS clinical system integration (API or FHIR/HL7 compliance and write-back capability.)"*



T-Pro Compliance:

T-Pro delivers seamless and standards-compliant clinical system integration, supporting HL7, FHIR, and proprietary APIs across a range of NHS environments. Our platform is designed to interface securely and reliably with leading EHR systems, including EMIS, SystmOne, Cerner, Epic, Meditech, Intersystems and Nervecentre enabling real-time exchange of clinical data. Through our robust integration architecture, T-Pro's dedicated NHS integration team ensure not only structured data read capabilities but also full write-back functionality—allowing clinician-generated documentation, structured notes, observations, and metadata to be automatically returned and correctly filed within the patient record. This eliminates duplication, reduces administrative burden, and enhances documentation accuracy. Whether through FHIR-based endpoints or legacy HL7 messaging, our integration layer is fully interoperable with NHS services and adheres to NHS Digital's Interoperability Design Standards, ensuring your organisation remains compliant and future-ready.

NHS Requirement: *"The responsibility for translation accuracy remains with the AVT supplier."* ✓

T-Pro Compliance:

T-Pro focuses exclusively on clinical documentation, with no use of third-party translation services — eliminating translation risk entirely. Instead, we develop and deploy proprietary language-specific models within our own in-house speech engine, purpose-built for healthcare environments. This includes dedicated models for multiple languages, allowing us to support clinicians without relying on downstream translation layers.

Accuracy of summarisation remains the supplier's responsibility, and we fully embrace that accountability. Clinician validation is integrated into every workflow, and model performance is continuously monitored, benchmarked, and improved through our internal quality management system. This approach ensures that T-Pro Copilot delivers precise, clinically meaningful documentation — in any supported language — with no compromise on safety, fidelity, or responsibility

Enhanced Requirements

NHS Requirement: *"System integration with clinical workflows."* ✓

T-Pro Compliance:

T-Pro is purpose-built to integrate directly into existing NHS clinical workflows, enhancing productivity with enterprise level configurability. Our flexible platform adapts to diverse specialties, appointment types, and settings—whether in outpatient clinics, community services, or acute hospital environments. From the moment a consultation is scheduled, T-Pro integrates with patient administration systems and EHRs to retrieve key encounter data, enabling clinicians to begin documentation immediately. During or after the encounter, clinicians can use voice or text input to create notes, which are processed by our AI-powered scribe and routed through a structured workflow for editing, approval, and filing. Integration is never one-size-fits-all: we tailor implementation to each site's technical architecture, interoperability maturity, and governance models. Our team works directly with Trust IT and clinical informatics teams to ensure safe, compliant, and context-aware deployment. Each step—from data capture and document review to approval and EHR filing—is tailored to mirror existing clinical processes. By embedding into your existing clinical systems and processes, T-Pro delivers efficiency gains, reduces cognitive and administrative load, and helps clinicians focus more time on patient care.

Clinical & Operational Benefits

NHS Requirement: *"Clear economic justification and workforce impact."*



T-Pro Compliance:

T-Pro Copilot has demonstrated clear potential for economic and workforce benefit across NHS care environments. By reducing time spent on documentation, the platform enables clinicians to reallocate capacity to other impactful activity.

The consolidation of documentation tools into a single ambient scribe platform has reduced complexity for users, supported standardisation of processes, and lowered training and maintenance burdens for Trust IT teams.

Clinicians have reported improvements in workflow satisfaction and a reduction in after-hours documentation, supporting workforce well-being and long-term workforce sustainability. These factors collectively provide an incredibly robust business case for AVT adoption at scale.

NHS Requirement: *"Evidence of real-world clinical validation of benefits in the NHS care setting proposed (e.g. enhancing clinical efficiency and workflow, reducing administrative burden; improving patient care by increasing face to face time with patients; improving accuracy of documentation; improving data quality and capture of structured data recorded in electronic patient record systems)."*



T-Pro Compliance:

T-Pro Copilot has been validated through real-world NHS deployments across diverse care settings. Our platform manages **800K** documents a month and has consistently demonstrated improvements in documentation workflows, clinician satisfaction, and data completeness.

Clinicians report a notable reduction in administrative workload, greater ability to focus on patient care during consultations, and improved documentation turnaround times. The platform has also supported enhancements in data quality by enabling structured summarisation and seamless integration into electronic patient records.

Feedback from pilot programmes and live use indicates a high level of clinical acceptability, with Copilot seamlessly fitting into existing workflows.

Commitment to Ongoing Compliance

T-Pro maintains continuous compliance through structured collaboration with ICBs, ongoing clinical safety governance, and proactive alignment with evolving NHS regulatory requirements. Our internal framework includes routine DPIA reviews, biannual clinical safety audits, and annual cybersecurity testing to ensure that all deployments remain safe, secure, and compliant.

We are committed to exceeding NHS standards through transparency, responsiveness, and collaboration with the Trust and regional teams. Our approach is rooted in co-design with clinicians, respect for data protection principles, and technical flexibility to integrate with local systems and workflows.

We welcome scrutiny and are fully open to audit, assurance requests, and detailed documentation review. Our team stands ready to support NHS England's vision for safe, effective, and standardised AVT adoption across all care settings.

Should you require additional evidence or wish to discuss any element of our compliance posture, please do not hesitate to contact us directly.

Yours sincerely,

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Chief Executive Officer

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